

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION MAR 30 1998

In the Matter of:

PUBLIC SERVICE
COMMISSION

PETITION FOR A RULING ON THE) CASE NO. 96-353
FEASIBILITY OF ALLOWING THE)
USE OF MEDIA OTHER THAN FIBER)
FOR COLLOCATION IN RURAL)
AREAS OF KENTUCKY)

PETITION OF SOUTHEAST TELEPHONE, LTD.

FOR A DECISION ON THE FEASIBILITY OF

ALLOWING THE USE OF COPPER MEDIA

FOR INTERCONNECTION

IN RURAL AREAS OF KENTUCKY

Pursuant to K. R. S. Section 278.020 and 807 KAR 5:001 Section 9, SouthEast Telephone, Ltd.(SouthEast) respectfully requests that the Kentucky Public Service Commission issue a ruling regarding whether it is feasible that Incumbent Local Exchange Carriers ("ILECs") and Competitive Local Exchange Carriers ("CLECs") making interconnection such that cable runs into ILEC Central Offices in rural areas be allowed to use copper cable and/or coaxial cable as the medium for said interconnection. In support of this request, SouthEast states the following:

1. SouthEast is authorized to provide local exchange service in Kentucky.
2. SouthEast has entered into a negotiated agreement with BellSouth Telecommunications, Inc. for resale, unbundled elements and interconnection which was approved by this Commission on October 16,

1996 ("Agreement"). The Agreement was amended and such amendment was approved by this Commission on July 16, 1997.

3. BellSouth and SouthEast are currently discussing the method of interconnection between the companies in a rural area in Kentucky including an amendment to the existing Agreement to change Attachment C-13 to allow copper interconnection in rural areas.
4. Section 51.323(d)(3) of Federal Communications Commission Rules allow State Commissions to approve the use of copper or coaxial cable instead of fiber for interconnection.
5. Use of copper or coaxial cable would benefit the public convenience by lowering system costs, thereby lowering the cost of service to rural customers. Further ILECs would be less burdened due to the size of the markets in rural areas.

Further, SouthEast believes that the issue of use of copper or coaxial cable in rural areas is one which companies will face in negotiation of interconnection agreements between ILECs and CLECs in the future. Accordingly, it is an issue that should properly be decided by this Commission.

6. SouthEast concedes that the use of fiber for interconnection, in metro areas with high concentrations of population and the potential for numerous interconnection requests from a variety of CLECs, is probably a necessity. However, rural areas in Kentucky do not have high concentrations of

population and, to date, there are fewer CLECs in those less profitable areas. This lack of population concentration and smaller number of alternative providers of service reinforces the feasibility of the use of copper or coaxial as the interconnection medium in rural areas. Further, in most cases, ILECs use these less expensive forms of media for cable runs into their central offices in rural areas at present.

7. SouthEast's contact address and voice number is:

SouthEast Telephone
P. O. Box 1001
Pikeville, KY 41502
(606) 432-3000

8. The attorney for SouthEast authorized to represent it in this proceeding and to take service of all documents is:

Glenn Acree, Esq.
Acree Law Office, PSC
836 Euclid Avenue, Suite 309
Lexington, KY 40507
(606) 266-0088

Wherefore, SouthEast respectfully requests that the Commission issue its ruling declaring that copper and/or coaxial cable are feasible media for interconnection purposes in rural areas in Kentucky.

Respectfully submitted,



Glenn E. Acree
Acree Law Office, PSC
836 Euclid Avenue, Suite 309
Lexington, KY 40507
(606) 266-0088
Counsel for SouthEast Telephone

CERTIFICATE OF SERVICE

This is to certify that the foregoing Petition was served by mailing a true and correct copy thereof, by U.S. mail, postage prepaid to the following:

Creighton E. Mershon, Sr.
BellSouth Telecommunications, Inc.
P. O. Box 32410
Louisville, Kentucky 40232

This 26th day of March, 1998.


Glenn E. Acree